

Trey A. Monsour  
State Bar No. 14277200  
Polsinelli PC  
2950 N. Harwood, Suite 2100  
Dallas, Texas 75201  
Telephone: (214) 397-0030  
Facsimile: (214) 397-0033  
tmonsour@polsinelli.com

Jeremy R. Johnson (Admitted *Pro Hac Vice*)  
Polsinelli PC  
600 3rd Avenue, 42nd Floor  
New York, New York 10016  
Telephone: (212) 684-0199  
Facsimile: (212) 684-0197  
jeremy.johnson@polsinelli.com

COUNSEL TO THE DEBTORS AND  
DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

SENIOR CARE CENTERS, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 18-33967 (BJH)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON MAY 31, 2019 AT 10:30 A.M. (CT)**

**MATTERS GOING FORWARD**

1. Motion of Debtors to Approve Agreements for (I) Use of Cash Collateral, (II) Granting Adequate Protection Between Certain Senior Care Centers Debtors and Love Funding Corporation, (III) Modifying the Automatic Stay, and (IV) Granting Relief Related to Use of Love Funding Corporation's Cash Collateral [Docket No. 1180; Filed: 5/23/2019]

Objection Deadline: May 29, 2019

Related Document(s):

- a) Notice of Hearing [Docket No. 1185; Filed: 5/24/2019]

---

<sup>1</sup> The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

Response(s) Received:

- a) Limited Objection of Atlas Dental Management, LLC to Motion of Debtors to Approve Agreements for (I) Use of Cash Collateral, (II) Granting Adequate Protection Between Certain Senior Care Centers Debtors and Love Funding Corporation, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief Related to Use of Love Funding Corporation's Cash Collateral [Docket No. 1196; Filed 5/28/2019]

Status: This matter will go forward on an interim basis.

- 2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 24; Filed: 12/5/2018]

Objection Deadline: March 18, 2019

Related Document(s):

- a) Findings of Fact and Conclusions of Law Regarding the Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 74; Entered: 12/7/2018]
- b) Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 75; Entered: 12/7/2018]
- c) Preliminary Omnibus Reply in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 199; Filed: 12/26/2018]
- d) Debtors' Memorandum of Law Regarding the Debtors' Obligation to Pay Rent for Nursing Home Leases Subject to a Pending Rejection Motion [Docket No. 321; Filed: 1/10/2019]
- e) G Debtors' Brief in Opposition Regarding the Debtors' Obligation to Pay Rent for Nursing Home Leases Subject to a Pending Rejection Motion [Docket No. 324; Filed: 1/10/2019]
- f) Revised Budget [Docket No. 351; Filed: 1/14/2019]

- g) Second Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 431; Entered: 1/24/2019]
- h) Notice of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et. al., of an Agreed Extension of the Challenge Deadline [Docket No. 590; Filed 2/28/2019]
- i) Notice of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, et. al., of a Second Agreed Extension of the Challenge Deadline [Docket No. 486; Filed 2/11/2019]
- j) Third Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 673; Entered 3/14/2019]
- k) Fourth Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 962; Entered 4/17/2019]

Response(s) Received:

- a) Objection of Texas Ad Valorem Taxing Jurisdictions to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 117; Filed: 12/12/2018]
- b) Texas Health and Human Services Commission's Limited Objection to motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 142; Filed: 12/17/2018]
- c) Limited Objection of San Antonio North Knoll, LLC to the Use of Cash Collateral [Docket No. 146; Filed: 12/19/2018]
- d) Response of HC Hill Country Associates, Ltd., H-C Associates, Ltd., HC-RW Associates Ltd., Hidalgo Healthcare Realty, LLC, and Socorro Health Realty, LLC to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 148; Filed: 12/19/2018]

- e) CCP Landlords' Reservation of Rights and Limited Objection to Debtors' Motion to Use Cash Collateral [Docket No. 149; Filed: 12/19/2018]
- f) Objection of OLP Wyoming Springs, LLC to (I) Motion for Entry of Order Authorizing Payment of Prepetition Taxes and Fees; and (II) Motion for Entry of Interim and Final Orders Authorizing the Use of Cash Collateral [Docket No. 151; Filed: 12/19/2018]
- g) Limited Objection of Atlas Dental Management, LLC to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 152; Filed: 12/19/2018]
- h) TXMS Real Estate Investments, Inc.'s Objection to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 153; Filed: 12/19/2018]
- i) Objection of PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 154; Filed: 12/19/2018]
- j) Limited Objection of KeyBank National Association to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 155; Filed: 12/19/2018]
- k) The United States of America's Limited Objection to Debtors' Motion for Entry of Interim and Final Order Authorizing Use of Cash Collateral [Docket No. 157; Filed: 12/19/2018]
- l) Tax Authorities' Objection to Interim Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 158; Filed: 12/19/2018]
- m) Granite Landlords' Limited Objection and Limited Joinder in KeyBank National Association's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 174; Filed: 12/21/2018]

- n) Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 187; Filed: 12/21/2018]
- o) CCP Landlords' First Amended Objection to Debtors' Motion to Use Cash Collateral [Docket No. 189; Filed: 12/21/2018]
- p) Brief in Support of Objection of PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 205; Filed: 12/26/2018]
- q) Limited Objection of Love Funding Corporation to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II), Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 270; Filed: 1/7/2019]
- r) Limited Objection of Onsite Dentists of Texas to Debtors' Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 293; Filed: 1/9/2019]
- s) CCP Landlords' Memorandum of Law in Support of Debtors' Obligations to Timely Pay Post-Petition Rental Obligations [Docket No. 302; Filed: 1/10/2019]
- t) HC Hill Country Associates, Ltd., H-C Associates, Ltd., HC-RW Associates Ltd., Hidalgo Healthcare Realty, LLC, and Socorro Health Realty, LLC's Memorandum of Law in Support of Response to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 307; Filed: 1/10/2019]
- u) OLP Wyoming Springs, LLC's Supplemental Brief in Support of Objection to (I) Taxes Motion and (II) Cash Collateral Motion [Docket No. 312; Filed: 1/10/2019]
- v) Cedar Park Healthcare, LLC's Hearing Brief Regarding Debtors' Post-Petition Lease Obligations Pending Rejection and Transition of Operations [Docket No. 313; Filed: 1/10/2019]

- w) TXMS Real Estate Investments, Inc.'s Surreply Brief in Support of Its Objection to Debtors Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 314; Filed: 1/10/2019]
- x) Brief in Support of Granite Landlords' Limited Objection and Limited Joinder in KeyBank National Association's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 315; Filed: 1/10/2019]
- y) Limited Objection of Berkadia Commercial Mortgage LLC to Motion of Debtors for Entry of Interim and Final Order (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 320; Filed: 1/10/2019]
- z) Limited Objection of Texas Nursing Home Management Solutions, LLC to Debtors' Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 344; Filed: 1/12/2019]
- aa) Texas Health and Human Services Commission's Supplemental Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 370; Filed: 1/16/2019]
- bb) Cedar Park Healthcare, LLC's Response to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 499; Filed: 2/13/2019]
- cc) POTA JV, LLC's Limited Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; (IV) Setting a Final Hearing; and (V) Granting Related Relief [Docket No. 531; Filed: 2/19/2019]

- dd) Brief In Opposition filed by Creditor PharMerica Long Term-Care, LLC d/b/a PharMerica to Motion to Use Cash Collateral [Docket No. 712; Filed 03/18/2019]
- ee) Patient Care Ombudsman Request for Payment of Fees and Costs and Objection to the Use of Cash Collateral to Pay Professionals Significantly More Than Which Was Budget for the PCO and His Counsel [Docket No. 720; Filed 3/19/2019]
- ff) Restated & Amended Objection of Berkadia Commercial Mortgage LLC to Motion of Debtors for Entry of Interim Order and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protection, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief [Docket No. 1099; Filed 5/16/2019]
- gg) ORIX Real Estate Capital, LLC's Limited Objection to Entry of Final Cash Collateral Order [Docket No. 1160; Filed 5/21/2019]
- hh) Granite Landlords' Supplemental Objection to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Granting Adequate Protecting, (III) Modifying the Automatic Stay, (IV) Setting a Final Hearing, and (V) Granting Related Relief (Docket No. 1172; Filed 5/22/2019)
- ii) Limited Objection of Texas Nursing Home Management Solutions, LLC to Debtors' Entry Of Interim and Final Orders (i) Authorizing the Use of Cash Collateral; (ii) Granting Adequate Protection; (iii) Modifying the Automatic Stay; (iv) Setting a Final Hearing; and (v) Granting Related Relief [Docket No. 1195; Filed 5/28/2019]
- jj) Patient Care Ombudsman's Limited Objection to the Debtors Use of Cash Collateral and Entry of a Final Order on Cash Collateral [Docket No. 1208; Filed 5/29/2019]

Status: This matter will go forward on an interim basis.

Dated: May 29, 2019  
Dallas, Texas

Respectfully submitted,

**POLSINELLI PC**

/s/ Trey A. Monsour

Trey A. Monsour (State Bar No. 14277200)  
2950 N. Harwood, Suite 2100  
Dallas, Texas 75201  
Telephone: (214) 397-0030  
Facsimile: (214) 397-0033  
tmonsour@polsinelli.com

-and-

Jeremy R. Johnson (Admitted *Pro Hac Vice*)  
600 3rd Avenue, 42nd Floor  
New York, New York 10016  
Telephone: (212) 684-0199  
Facsimile: (212) 684-0197  
jeremy.johnson@polsinelli.com

*Counsel to the Debtors and  
Debtors in Possession*